

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

FRANK D. SEINFELD,)	
)	
Plaintiff,)	
)	
-against-)	Case No.: 05-298(JJF)
)	
CRAIG R. BARRETT, CHARLENE)	
BARSHEFSKY, E. JOHN P. BROWNE, D.)	
JAMES GUZY, REED E. HUNDT,)	
PAUL S. OTELLINI, DAVID S.)	
POTTRUCK, JANE E. SHAW, JOHN L.)	
THORNTON, DAVID B. YOFFIE,)	
ANDREW S. GROVE, and)	
INTEL CORPORATION,)	
)	
Defendants.)	

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Plaintiff Frank D. Seinfeld hereby moves for summary judgment enjoining payments under the 2005 Intel Corporation Executive Officer Incentive Plan as Amended and Restated Effective May 18, 2005. The grounds for this motion are that Intel's proxy statement for the annual meeting of stockholders on May 18, 2005 is materially incomplete, inadequate, false, and misleading under *Shaev v. Saper*, 320 F.3d 373 (3rd Cir. 2003), as shown in the accompanying affidavit of Frank D. Seinfeld, sworn to June 3, 2005, as well as the accompanying Affidavit of A. Arnold Gershon,

sworn to June 3, 2005, and the supporting brief.

FOX ROTHSCHILD LLP

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Date: June 7, 2005

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2005, I electronically filed the foregoing Plaintiff's Motion and Brief in Support of His Motion for Summary Judgment with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following:

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/s/ Francis G.X. Pileggi
Francis G.X. Pileggi (Del. Bar No. 2624)